

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

LESLEY S. MITCHELL)	Civil Action No. 05-80 ERIE
)	Judge Sean J. McLaughlin
Plaintiff)	
)	
v.)	ELECTRONICALLY FILED
)	
TOWNSHIP OF MILLCREEK, et al.)	
)	
Defendant)	

**JOINT MOTION TO ENLARGE DISCOVERY PERIOD
AND AMEND CASE MANAGEMENT ORDER**

AND NOW, this 28th day of November, 2005, come Plaintiff, Lesley S. Mitchell, and Defendants, Township of Millcreek and Millcreek Township Police Department, by and through their attorneys, the undersigned, motioning the Court to enlarge the discovery period and amend the Case Management Order, stating in support thereof the following:

1. Pursuant to the Court's initial Case Management Order dated July 20, 2005, the discovery period is scheduled to end on December 27, 2005.
2. The Court's Order also provided filing deadlines for dispositive motions, pretrial narratives and other matters.
3. Plaintiff's case was transferred recently to her current counsel in conjunction with the campaign and election to the office of Mayor of the City of Erie, Pennsylvania of her prior attorney, Joseph Sinnott.
4. The parties have recently exchanged written discovery responses and anticipate the scheduling and conducting of depositions which will take several months to complete.

5. Therefore, the parties request a 90-day enlargement of the discovery period and a similar amendment to the remainder of the schedule in the Court's initial Case Management Order.

6. No prejudice would result if the Court were to grant this motion.

7. This is the parties' first request to enlarge the discovery period.

WHEREFORE, Plaintiff, Lesley S. Mitchell, and Defendants, Township of Millcreek and Millcreek Township Police Department, respectfully request the Court to order that the discovery period be enlarged until March 27, 2006, that dispositive motions be filed on or before March 27, 2006, that Plaintiff's pretrial narrative statement be filed on or before March 27, 2006 and that Defendant's pretrial narrative statement be filed on or before April 16, 2006.

Respectfully submitted,

KNOX McLAUGHLIN GORNALL &
SENNETT, P.C.

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